REMARKS

This Response is in response to the Office Action mailed August 1, 2008. Claims 1-10, 13-21, 33, 35 and 37-54 are pending. Claims 1-10, 13-21, 33, 35 and 37-40 are amended, and claims 41-54 are presented new. The claims have been amended for clarity, consistency and grammatical improvement or to correct a claim dependency. The amendments do not narrow the claims and are not made for purposes related to patentability. No new matter has been introduced by these amendments. New claims 41-45, 46-49 and 50-54 are supported by claims 1-7, 8-14 and 15-21 and 38, respectively and the specification.

Interview Summary

The undersigned attorney thanks the Examiner for the courtesies extended during an in-person Interview on October 7, 2008. In addition to Examiner Hashemi, the undersigned attorney and in-house counsel of the Assignee, Sumeet Magoon, were present. During the Interview, the claims were discussed in view of the outstanding rejections. The prior art, Ryan et al., was discussed. No agreement was reached.

Claim Rejections under 35 USC § 102

In the office Action, claims 1-10, 13-21, 33, 35 and 37-40 were rejected as being anticipated by Ryan et al. (US Patent No. 5,655,085) (hereinafter "Ryan").

This rejection is traversed because Ryan fails to disclose all the elements of the claimed invention. The remarks below address the rejections of the independent claims first, and then the dependent claims.

Independent Claims 1, 8 and 15

Claim 1:

With regard to independent claim 1, the office action asserts that all the elements of the last paragraph beginning "wherein the client component is adapted for . . ." is disclosed in Ryan at Fig. 3B-2. However, Ryan fails to disclose several elements of this paragraph.

One element not disclosed by Ryan is that the client component be adapted for "(i) allowing a user to define tasks during the execution phase of the program that processes the tasks and rules by way of the user interface of the client component, wherein said tasks are carried out by an employee that achieve a goal upon completion." The application at pages 184-185 describes an embodiment where the user, a Task Librarian, may define tasks using the Task Library user interface. However, Fig. 3B-2 of Ryan fails to disclose allowing a user to define a task. FIG. 3B-2 discloses logical decision points where a user indicates whether an applicant works with a corporate sponsor and selects a policy. In Ryan, the tasks are pre-defined and the user is merely responding to the pre-defined tasks following the logic

flow shown in the Figure, but the user does not define the task to be performed. Therefore, this feature of claim 1 is not disclosed by Ryan.

A second element not disclosed by Ryan is that the client component be adapted for "(ii) allowing the user to define the rules, during the execution phase of the program that processes the tasks and the rules, by way of the user interface of the client component, wherein said rules dictate which of the tasks are selected based on predetermined events defined in said rules." The application at pages 184-185 describes an embodiment where the user, a Task Librarian, may define rules using the Task Library user interface. However, Fig. 3B-2 of Ryan fails to disclose allowing a user to define a rule. FIG. 3B-2 discloses logical decision points where a user indicates whether an applicant works with a corporate sponsor and selects a policy. In Ryan, the selection of tasks to be performed are determined by pre-defined rules embedded in the logic that select the next task based on the user's response, such as a yes or no response. Such a response is not the defining of a rule. Ryan at Fig. 3B-2 does not disclose allowing a user to define the rules during the execution phase of the program that processes the tasks and the rules where the rules are used to select the task. Therefore, this feature of claim 1 is not disclosed by Ryan.

Therefore, for at least these two reasons, claim 1 is not anticipated by Ryan et al. This rejection should be withdrawn. Because claims 2-7 and 33 depend from claim 1, the rejection of these claims should also be withdrawn.

Claim 8:

With regard to independent claim 8, the office action rejects claim 8 for the same reasons as claim 1. The arguments above with respect to claim 1 apply equally to claim 8 as those same two recited claim elements of claim 1 are recited in claim 8. For this reason, the rejection of claim 8 and its dependent claims 9-10, 13-14 and 35 should be withdrawn.

In addition, claim 8 recites additional elements that have not been noted in the office action. Specifically, elements of claim 8 not noted in the office action include:

> "a controller component code segment adapted for . . . , providing validation within a logic unit of work, containing logic to interact with the business component, creating one or more business objects, interacting with the adapter component to add, retrieve, modify, or delete business objects, and providing dirty flag processing to notify a user of change processing."

Ryan fails to disclose these recited elements of claim 8. In particular, Ryan fails to disclose providing validation within a logic unit of work, creating business objects, or providing dirty flag processing. Therefore, for these additional reasons the rejection of claim 8 and its dependent claims 9-10, 13-14 and 35 should be withdrawn.

Claim 15:

With regard to independent claim 15, the office action rejects claim 15 for the same reasons as claim 1. The arguments above with respect to claim 1 apply equally to claim 15 as those same two recited claim elements of claim 1 are recited in claim 15. For this reason, the rejection of claim 15 and its dependent claims 16-21 and 38-40 should be withdrawn.

In addition, claim 15 recites additional elements that have not been noted in the office action. Specifically, elements of claim 15 not noted in the office action include:

> "one or more client components included with each client, each client component of each client adapted for communicating and manipulating data with a first data type; . . .
> one or more server components adapted for communicating and manipulating data with a second data type; and
> one or more adapter components included with each client for translating data from the one or more client components to the second data type when communicating data from the client to the server and further translating data from the one or more server components to the first data type when communicating data from the server to the client."

Ryan fails to disclose these recited elements of claim 15. In particular, Ryan fails to disclose a client-server computer system and fails to disclose a system with adapter components that translate data from a first data type and second data type when communicating data between a server and a client as recited. Therefore, for these additional reasons the rejection of claim 15 and its dependent claims 16-21 and 38-40 should be withdrawn.

Dependent claims:

Claims 3, 10 and 17:

Claims 3, 10 and 17 each recite that "an event is generated by data entered by a user and posted to an event queue, then said task is automatically generated based on the event received from the event queue." The present application illustrates an embodiment of an event queue at Figs. 10 and 14 and the supporting descriptions in

the specification. The office action asserts that this claimed feature involving the use of an event queue is disclosed in Ryan at Fig. 3B-2. This rejection is traversed because Ryan fails to disclose the use of an event queue as claimed. Ryan fails to disclose that events generated by data being entered are posted to an event queue first and then processed by the rules to generate the task. Indeed, Ryan not only fails to disclose the event queue as recited by claim 3, but also fails to disclose how the logic of Fig. 3B-2 is executed by a computer in response to the user inputs. Therefore, the feature of claims 3, 10 and 17 is not disclosed by Ryan, and the rejection should be withdrawn.

Claims 4 and 18:

Claim 4 depends from claim 3, and claim 18 depends from claim 16. Claim 4 recites that "the event queue is populated with events from the data components of a system," and claim 18 recites that "the server component further comprises an event queue populated with events generated by data entered by a user." The present application illustrates an embodiment of an event queue at Figs. 10 and 14. The office action asserts that this claimed feature involving the use of an event queue is disclosed in Ryan at step 122 of Fig. 3B-3. This rejection is traversed because Ryan fails to disclose the use of an event queue as claimed. As disclosed by Ryan, block 122 "is the branch of the system logic that identifies whether the system is to illustrate one Corporate Sponsored/User Selected Product or whatever number of policies fit the 'Best' criteria." (col. 19, lines 56-60). While there may be an "event" involved in

this identification step, this step fails to disclose an "event queue" as claimed. Therefore, the feature of claims 4 and 18 is not disclosed by Ryan, and the rejection should be withdrawn.

Claims 5, 38 and 39:

Claims 5 and 38 recite a "server component adapted to determine claim characteristics and match the claim characteristics to defined tasks." Claim 39 recites a "server component is further adapted to identify a claim characteristic for the insurance related claim being processed and associated with the event, and match the claim characteristic to a defined task." The present application describes an embodiment at page 185 where the claim characteristics are determined and matched to defined tasks. The office action asserts that this claimed feature of matching claim characteristics to a defined task is disclosed at step 128 of Fig. 3B-3 of Ryan. This rejection is traversed because Ryan fails to disclose determining characteristics of an insurance claim, and fails to disclose that the claim characteristics are matched to a defined task. As disclosed by Ryan, "Block 128, J Gets Total Number of Products Available, initializes a counter to keep track of the number of products meeting the desired criteria to be illustrated." (col. 19, lines 62-65). While this discloses a matching of a product's characteristics to desired criteria, it fails to disclose an "insurance claim," and fails to disclose matching the claim characteristics to a "task," which as recited in claim 1, is a task carried out by an employee. Therefore, the

feature of claims 5, 38 and 39 is not disclosed by Ryan, and the rejection should be withdrawn.

Claims 7, 14 and 21:

Claims 7, 14 and 21 recite "the outputted tasks are provided for display on a list prior to completion of the outputted tasks." The present application at pages 179-182 provide a description of an embodiment of tasks listed on the "Task Assistant" display before the employee completes the tasks. The office action asserts that this claimed feature of displaying the tasks is disclosed at step 258 of Fig. 3C-1 of Ryan. As disclosed by Ryan, "when the user has gone through this loop as many times as necessary to update whatever screen need updating, from Block 252, the choice of Proceed, Block 258 can be made. The illustration then proceeds to Fig. 3B-4." (col. 22, lines 63-67). Ryan fails to disclose here placing tasks to be performed on a list prior to completion, as recited by claims 7, 14 and 21. Therefore, the feature of claim 7, 14 and 21 is not disclosed by Ryan, and the rejection should be withdrawn.

Claim 40:

Claim 40 depends from claim 15 and 39. Claim 40 recites that the "claim characteristic includes a line of business associated with the claim wherein the lines of business comprise automobiles, yachts and property insurance." The office action asserts that this claimed feature is disclosed at Fig. 27A of Ryan. However, Ryan discloses only life insurance policies at Fig. 27A. While Ryan mentions health insurance and homeowner's insurance in the background of the invention section,

Ryan fails to disclose such insurance lines of insurance as being applicable to the invention disclosed by Ryan, or how a line of insurance is a claim characteristic that is matched to a defined task, as recited by claim 40. Therefore, the feature of claim 40 is not disclosed by Ryan, and the rejection should be withdrawn.

New Claims

Claims 41-54:

New independent claims 41, 46, and 50 recite the main features of independent claims 1, 8 and 15 in the form of computer system apparatus. Claims 41, 46 and 50, along with their dependent claims, are patentable for the same reasons as noted above with respect to claims 1, 8 and 15. Dependent claims 42, 47, and 51 are also patentable for the same reasons as noted above with respect to claims 3, 10, and 17. Dependent claims 43 and 52 are also patentable for the same reasons as noted above with respect to claims 4 and 18. Dependent claims 44, 48, and 53 are also patentable for the same reasons as noted above with respect to claims 5, 38 and 39. Dependent claims 45, 49, and 54 are also patentable for the same reasons as noted above with respect to claims 7, 14, and 21.

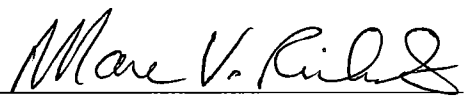
CONCLUSION

In view of the foregoing remarks and because no other rejections are pending against these claims, Assignee respectfully assert that the claims are in condition for allowance. Assignee respectfully requests a timely Notice of Allowance for this case.

The undersigned attorney respectfully requests an Interview with the Examiner to discuss any remaining matters to expedite allowance of this case.

Respectfully submitted,

Dated: 12/1/08



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